



**Federal Association of German
Leasing Companies**

Comments concerning

**‘Have your say’ on burden reduction and simplification for
competitiveness of small mid-cap enterprises - Omnibus IV
Regulation**

Brussels, 21 August 2025

Federal Association of
German Leasing
Companies

Avenue des Arts 19 A-D
B-1000 Brüssel

Tel: +32 (0)2 203 92 90
bdl@leasingverband.de
www.leasingverband.de



On the occasion of the consultation launched on 23 May 2025 on 'Burden reduction and simplification for competitiveness of small mid-cap enterprises - Omnibus Regulation IV' the Bundesverband Deutscher Leasing-Unternehmen e. V. (BDL) is submitting some comments below.

The BDL is the voice of the German leasing industry. Based in Berlin and with a representation in Brussels, the BDL represents the interests of the entire leasing industry in Germany, which generated a new business volume of around 80 billion euros in 2024. Its approximately 220 members, including around 150 leasing companies, represent almost 90 per cent of the German leasing market volume.

The leasing sector understands itself as a link between the real and financial economy and supports the sales and investments of its partners and customers from the business world. Leasing companies traditionally finance a wide range of objects for the energy, heating and mobility transition (photovoltaic systems, wind farms, electromobility, bicycles). They also help companies to make their production processes more energy-efficient or to convert to innovative technologies. Leasing therefore contributes significantly to the overall economic investment supply, particularly for German SMEs. At the same time, the leasing companies themselves are predominantly characterised by SMEs. More than three quarters of all German leasing companies have fewer than 50 employees, half of them even have fewer than 15 employees.

With its recently published "Compass for Competitiveness", the European Commission is pursuing the goal of boosting the growth of the European economy and strengthening the competitiveness of the European economy. Therefore, the BDL welcomes in general the EU-Commission's initiative, the so-called Omnibus IV Simplification Package, which includes proposals to cut red tape, reduce costs, and modernize EU- rules as part of the ongoing Single Market simplification effort.

We expressly support the European Commission's intention to deliver at least a 25% reduction in administrative burdens - and at least 35% for SMEs - by the end of this mandate. Reducing administrative burdens, adapting reporting obligations and targeting regulatory requirements more specifically are important steps towards offering small and medium-sized enterprises (SMEs) in particular better framework conditions. This should be achieved at first.

Regarding the introduction of a new category, the so-called Small Mid-Cap (SMC), we doubt its effectiveness for the following reasons:

- **Consistency with other EU-legislation:** The risk of regulatory requirements becoming even more complex should be avoided. For example, the proposal to amend the Corporate Sustainability Reporting Directive (CSRD) stipulates that in future only companies with more than 1,000 employees and either a turnover of more than 50 million euros or a balance sheet total of 25 million euros will be re-quired to prepare a sustainability report. The introduction of another threshold that is not based on the proposed 1,000 employees leads to inconsistency in the regulatory framework and makes the implementation of different thresh-olds unnecessarily complicated.



- **Scope:** Following the argument of consistency the creation of the SMC category with an upper limit of up to 749 employees and €150 million is not entirely clear.

The proposal on Omnibus Regulation IV is a constructive step toward a more proportionate regulatory environment for SMCs.

Concerning the current economic situation in the European Union it is crystal clear, that all companies benefit from regulatory relief, but very small companies require special consideration. There are doubts that the introduction of a new SMC category will dilute or even undermine existing SME support, as support structures and regulatory relief will now be segmented between several company sizes. Unintended consequences/effects could lead to further complications for SMEs.

Without additional safeguards in horizontal legislation, the goal of simplification and reduction of burden could be undermined. In addition, practicability should be better implemented and controlled.

To fulfil their role as a partner to SMEs and an investment driver for the economy, leasing companies need reliable framework conditions.
